

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE ELECTRONIC BOOKS ANTITRUST)	No. 11-md-02293 (DLC)
LITIGATION)	ECF Case
)	
)	
This Document Relates to:)	<u>CLASS ACTION</u>
)	
ALL ACTIONS)	
)	

**DEFENDANTS HACHETTE, HARPERCOLLINS, AND SIMON & SCHUSTER'S
MOTION FOR AND MEMORANDUM IN SUPPORT OF FINAL APPROVAL OF
CLASS PLAINTIFFS' SETTLEMENT**

Defendants Hachette Book Group, Inc., Hachette Digital Inc., and Hachette Livre SA (collectively, "Hachette"), HarperCollins Publishers L.L.C. ("HarperCollins"), and Simon & Schuster, Inc., and Simon & Schuster Digital Sales, Inc. (collectively, "Simon & Schuster") respectfully request that this Court grant this motion and enter an Order containing the findings and relief requested in the Class Plaintiffs' Motion for Final Approval of Settlement Agreement and Distribution Plan and accompanying papers ("Plaintiffs' Motion").

The Settlement Agreement was extensively negotiated by the Class Plaintiffs and each of the above-named Defendants, at arm's length and with the assistance of the Honorable Kimba M. Wood. The Settlement Agreement and Distribution Plan are fair, reasonable, and adequate, and easily meet the standards for final approval. Therefore, Hachette, HarperCollins, and Simon & Schuster respectfully request that this Court grant this motion and the Plaintiffs' Motion.

Dated: November 26, 2013

Respectfully submitted,

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